

EXHIBIT I

McKenna, Krissy (BN)

From: McKenna, Krissy (BN)
Sent: Friday, July 19, 2024 4:25 PM
To: 'Lacey, Catherine'; Davis, Blake (Bay Area); Lonergan, Lucas (Bay Area); Banks, Ryan (OC); Prasad, Praatika; WSGR - Orca Wiz; Cottrell@RLF.com; Farnan@RLF.com; haynes@rlf.com
Cc: #C-M ORCA SECURITY - WIZ - LW TEAM; RSmith@morrisnichols.com; JBlumenfeld@MNAT.com
Subject: RE: Orca v. Wiz | Priority ESI Requests

Caty,

That is right. Wiz's total hit counts are around 30,000 **more** than Orca's, so your complaints about a disparity in the parties' respective burdens are misplaced.

While we disagree with your arguments about today's submission, in the interest of compromise, we're willing to proceed with Wiz's language. Please let us know whose signature to include for Wiz.

Best,
Krissy

From: Lacey, Catherine <clacey@wsgr.com>
Sent: Friday, July 19, 2024 4:07 PM
To: McKenna, Krissy (BN) <Krissy.McKenna@lw.com>; Davis, Blake (Bay Area) <Blake.Davis@lw.com>; Lonergan, Lucas (Bay Area) <Lucas.Lonergan@lw.com>; Banks, Ryan (OC) <Ryan.Banks@lw.com>; Prasad, Praatika <pprasad@wsgr.com>; WSGR - Orca Wiz <WSGR-Orca-Wiz@wsgr.com>; Cottrell@RLF.com; Farnan@RLF.com; haynes@rlf.com
Cc: #C-M ORCA SECURITY - WIZ - LW TEAM <orcasecuritywiz.lwteam@lw.com>; RSmith@morrisnichols.com; JBlumenfeld@MNAT.com
Subject: RE: Orca v. Wiz | Priority ESI Requests

Krissy,

I was looking at your last email saying "Wiz's total count [is] 180,886 documents, about 30,000 less than Orca's total count," but I understand from your email and looking at the numbers again that it was backwards. Thank you for the correction.

The motion for teleconference is supposed to be a joint submission, and we do not agree that inserting argumentative characterizations of the dispute is appropriate. The parties can make their arguments in the briefing and at any conference held by the Court. The most neutral way to characterize the dispute is to simply quote the term, as we did in our edits to the motion. We did not insert any extraneous information or characterization of the issues, and we do not see why Orca insists on doing so. The very language from my prior emails you quote belies that we "conceded" your characterization of the term is accurate, as I only stated that **components of** the term (at that time) could potentially seek relevant information, but it only became clearer with Orca's further revisions that Orca wanted to focus the term on irrelevant information.

We do not believe that the Court would want to receive dueling submissions on this issue. Please confirm that Orca will revert to the last version of the motion that we circulated.

Thanks,
Caty

From: Krissy.McKenna@lw.com <Krissy.McKenna@lw.com>
Sent: Friday, July 19, 2024 12:47 PM
To: Lacey, Catherine <clacey@wsgr.com>; Blake.Davis@lw.com; Lucas.Lonergan@lw.com; Ryan.Banks@lw.com; Prasad, Praatika <pprasad@wsgr.com>; WSGR - Orca Wiz <WSGR-Orca-Wiz@wsgr.com>; Cottrell@RLF.com; Farnan@RLF.com; haynes@rlf.com
Cc: orcasecuritywiz.lwteam@lw.com; RSmith@morrisnichols.com; JBlumenfeld@MNAT.com
Subject: RE: Orca v. Wiz | Priority ESI Requests

EXT - krissy.mckenna@lw.com

Caty,

We agree that one party should not have to review significantly more total documents than the other. Currently, Wiz is asking Orca to review 30,000 more documents than Wiz (not even accounting for the documents hitting on Orca's cloud native term that Wiz refuses to review), but in the interest of compromise, Orca has agreed to move forward with productions.

Regarding your newly raised concern about the hit counts for Orca's cloud native search term, we note that: (1) this is an about-face from your position during at least the July 17 meet and confer, in which you agreed that Orca's revisions to the term resolved your hit count concerns but did not address your relevance objection; (2) Wiz has repeatedly argued that the overall count is the relevant metric, as opposed to individual search term counts, and as noted above, Orca's overall count is 30,000 hits lower than Wiz's; and (3) Wiz's own "access" term hit on roughly double the amount of documents (over 94,000), but in the spirit of compromise, Orca agreed to move forward with production.

Regarding your concern that the cloud native term comprises multiple terms, as Orca explained in email correspondence and during the parties' meet and confers, Orca objected to multiple of Wiz's terms as comprising more than one search term. Yet, again, in the interest of compromise Orca agreed to move forward with production. It is notable that Wiz refuses to offer Orca the same courtesy.

Finally, we have attached an updated version of the teleconference motion. We do not find it helpful to the Court at this stage, where no letter briefing will be provided until September, to provide the search term language as opposed to a summary of what the term is directed at, which Wiz notably conceded in its July 12 email (agreeing that "components of the term [] could seek potentially relevant information regarding the measure of damages in the case"). We also think the Court should be provided with the context that Wiz refuses to produce any documents in response to this term as opposed to merely objecting to it. We have otherwise accepted your edits. Given the 5pm ET deadline, please let us know by 4pm ET if Wiz signs off on this updated copy and whose signature we should include for Wiz.

Best,
Krissy

From: Lacey, Catherine <clacey@wsgr.com>
Sent: Friday, July 19, 2024 2:44 PM
To: McKenna, Krissy (BN) <Krissy.McKenna@lw.com>; Davis, Blake (Bay Area) <Blake.Davis@lw.com>; Lonergan, Lucas (Bay Area) <Lucas.Lonergan@lw.com>; Banks, Ryan (OC) <Ryan.Banks@lw.com>; Prasad, Praatika <pprasad@wsgr.com>; WSGR - Orca Wiz <WSGR-Orca-Wiz@wsgr.com>; Cottrell@RLF.com; Farnan@RLF.com; haynes@rlf.com
Cc: #C-M ORCA SECURITY - WIZ - LW TEAM <orcasecuritywiz.lwteam@lw.com>; RSmith@morrisnichols.com; JBlumenfeld@MNAT.com
Subject: RE: Orca v. Wiz | Priority ESI Requests

Krissy,

Thank you for putting the motion for teleconference together. Attached are our edits to the motion. As we have maintained throughout the meet and confers, it does not make sense for Wiz to have to review significantly more total documents than Orca in connection with the Priority Requests, especially because Orca is purporting to withhold terms for later. We also note that the specific term in the motion is still returning significant hits (deduped across custodians O365: 47,424 docs with families, Slack: 10,667 docs), and more than the 10,000 per custodian you proposed as a threshold in prior correspondence (although we maintain the overall burden of the Requests is the more important consideration). In addition, we have explained in prior meet and confers and correspondence our position that this comprises multiple terms. Therefore, while we are willing to move forward with the other terms at this time, we reserve the right to make arguments as to this term based on all of our objections, not just limited to relevance as indicated in your first draft of the motion. We also continue to reserve our right to make objections based on overall burden in connection with future requests.

Please let us know if this motion is acceptable to Orca, or provide any further edited version for us to review before filing.

Thanks,
Caty

From: Krissy.McKenna@lw.com <Krissy.McKenna@lw.com>
Sent: Friday, July 19, 2024 9:04 AM
To: Lacey, Catherine <clacey@wsgr.com>; Blake.Davis@lw.com; Lucas.Lonergan@lw.com; Ryan.Banks@lw.com; Prasad, Praatika <pprasad@wsgr.com>; WSGR - Orca Wiz <WSGR-Orca-Wiz@wsgr.com>; Cottrell@RLF.com; Farnan@RLF.com; haynes@rlf.com
Cc: orcasecuritywiz.lwteam@lw.com; RSmith@morrisnichols.com; JBlumenfeld@MNAT.com
Subject: RE: Orca v. Wiz | Priority ESI Requests

EXT - krissy.mckenna@lw.com

Caty,

In the event Wiz will not withdraw its objection to the cloud native term, attached is a motion for teleconference to be filed by 5pm ET today consistent with the ESI Agreement deadline. Please let us know if Wiz will withdraw its objection or, if not, whether Wiz is signed off on this motion so we can get it on file.

Best,
Krissy

From: McKenna, Krissy (BN)
Sent: Thursday, July 18, 2024 9:42 PM
To: 'Lacey, Catherine' <clacey@wsgr.com>; Davis, Blake (Bay Area) <Blake.Davis@lw.com>; Lonergan, Lucas (Bay Area) <Lucas.Lonergan@lw.com>; Banks, Ryan (OC) <Ryan.Banks@lw.com>; Prasad, Praatika <pprasad@wsgr.com>; WSGR - Orca Wiz <WSGR-Orca-Wiz@wsgr.com>; Cottrell@RLF.com; Farnan@RLF.com; haynes@rlf.com
Cc: #C-M ORCA SECURITY - WIZ - LW TEAM <orcasecuritywiz.lwteam@lw.com>; RSmith@morrisnichols.com; JBlumenfeld@MNAT.com
Subject: RE: Orca v. Wiz | Priority ESI Requests

Caty,

Below are the updated hit counts for Wiz's revised AI term, bringing Wiz's total count to 180,886 documents, about 30,000 less than Orca's total count. As agreed during our meet and confer on July 17, Orca understands both parties will now move forward with production for all terms, excluding Orca's cloud native term. Kindly let us know if Wiz will reconsider its position on that term, which is returning a reasonable number of hits, and which is plainly targeting information relevant to at least Orca's damages claims. Otherwise, we will plan to circulate a motion for teleconference addressing that term to be filed with the Court tomorrow, consistent with the parties' ESI Agreement.

Avi Shua

Term #	Search Term	Total Hit Count	Total Hits Including Family	Unique Hits
1	("artificial intelligence" OR ai OR "large language model" OR llm OR *gpt* OR openai OR "open ai" OR "amazon bedrock" OR "AWS bedrock" OR "google vertex" OR "google cloud vertex" OR sagemaker OR pytorch OR tensorflow OR "hugging face") AND (cloud OR environment* OR estate* OR platform* OR *spm* OR ((security OR posture) w/3 management) OR orca OR vm* OR (virtual w/3 machine*) OR workload* OR asset* OR scan*)	10,761	13,526	7,834

Arie Teter

Term #	Search Term	Hit Count	Total Hits Including Family
1	("artificial intelligence" OR ai OR "large language model" OR llm OR *gpt* OR openai OR "open ai" OR "amazon bedrock" OR "AWS bedrock" OR "google vertex" OR "google cloud vertex" OR sagemaker OR pytorch OR tensorflow OR "hugging face") AND (cloud OR environment* OR estate* OR platform* OR *spm* OR ((security OR posture) w/3 management) OR orca OR vm* OR (virtual w/3 machine*) OR workload* OR asset* OR scan*)	8,657	9,296

Yoav Alon

Term #	Search Term	Hit Count	Total Hits Including Family
1	("artificial intelligence" OR ai OR "large language model" OR llm OR *gpt* OR openai OR "open ai" OR "amazon bedrock" OR "AWS bedrock" OR "google vertex" OR "google cloud vertex" OR sagemaker OR pytorch OR tensorflow OR "hugging face") AND (cloud OR environment* OR estate* OR platform* OR *spm* OR ((security OR posture) w/3 management) OR orca OR vm* OR (virtual w/3 machine*) OR workload* OR asset* OR scan*)	7,695	9,355

Meghan Marks

Term #	Search Term	Hit Count	Total Hits Includ Family
1	("artificial intelligence" OR ai OR "large language model" OR llm OR *gpt* OR openai OR "open ai" OR "amazon bedrock" OR "AWS bedrock" OR "google vertex" OR "google cloud vertex" OR sagemaker OR pytorch OR tensorflow OR "hugging face") AND (cloud OR environment* OR estate* OR platform* OR *spm* OR ((security OR posture) w/3 management) OR orca OR vm* OR (virtual w/3 machine*) OR workload* OR asset* OR scan*)	11,769	13,466

Total Hits Deduped Across All Custodians:

Search Term	Total Documents Hit By Term	Total Documents Hit by Term Including Families	Slack Docum
(access* OR reach* OR attack*) AND (path* OR chain* OR vector* OR graph*)	46,543	94,714	
"artificial intelligence" OR (ai w/5 (secur* OR *spm* OR quer* OR search*)) OR "large language model" OR llm OR *gpt* OR openai OR "open ai" OR "amazon bedrock" OR "AWS bedrock" OR "google vertex" OR "google cloud vertex" OR sagemaker OR pytorch OR tensorflow OR "hugging face"	35,773	42,318	
(risk* OR vulnerabil* OR threat*) w/20 (sever* OR scor* OR priorit* OR match*)	24,152	34,548	
((agent* OR side) w/5 scan*) OR sidescan*	14,352	24,434	
(snapshot* OR (snap w/3 shot*) OR (imag* w/5 (VM* OR machine*))) w/20 (scan* OR analy* OR visual* OR vulnerab* OR detect* OR priorit* OR *remediat* OR mitigat* OR pars* OR sensitiv* OR risk* OR *threat* OR config* OR encrypt* OR locat*)	11,024	31,551	
("beyond network*" OR wiz) AND (beat* OR win* OR compet* OR rac* OR playbook* OR kill* OR succe*)	7,037	8,423	
("check point" OR checkpoint) AND (risk* OR vulnerabil* OR threat* OR secur*)	6,547	24,450	
("beyond network*" OR wiz) AND (patent* OR ip OR "intellectual property" OR invention* OR innovat* OR new)	5,947	7,249	
autoremediation OR automitigation OR ((auto* OR self OR event-driven) w/5 (remediat* OR mitigate*))	5,601	6,500	

(microsoft w/5 "cloud security") OR (microsoft AND (yinon OR costica OR assaf OR rappaport OR roy OR reznik OR ami OR luttwak))	2,250	18,823
("beyond network*" OR wiz) AND (risk* OR vulnerabil* OR threat*)	1,737	2,120
("check point" OR checkpoint) AND (risk* OR vulnerabil* OR threat*)	663	1,180

Total Documents De-duped Across All Terms and All Custodians

Total Documents	Total Documents Including Email Families
124,739	180,886

Best,
Krissy

From: Lacey, Catherine <clacey@wsgr.com>
Sent: Wednesday, July 17, 2024 11:06 PM
To: McKenna, Krissy (BN) <Krissy.McKenna@lw.com>; Davis, Blake (Bay Area) <Blake.Davis@lw.com>; Lonergan, Lucas (Bay Area) <Lucas.Lonergan@lw.com>; Banks, Ryan (OC) <Ryan.Banks@lw.com>; Prasad, Praatika <pprasad@wsgr.com>; WSGR - Orca Wiz <WSGR-Orca-Wiz@wsgr.com>; Cottrell@RLF.com; Farnan@RLF.com; haynes@rlf.com
Cc: #C-M ORCA SECURITY - WIZ - LW TEAM <orcasecuritywiz.lwteam@lw.com>; RSmith@morrisnichols.com; JBlumenfeld@MNAT.com
Subject: RE: Orca v. Wiz | Priority ESI Requests

Krissy,

Please run the following revised version of Wiz's "ai" term:

~~{("artificial intelligence" OR (ai /5 (secur* OR *spm* OR quer* or search*)) OR "large language model" OR llm OR *gpt* OR openai OR "open ai" OR "amazon bedrock" OR "AWS bedrock" OR "google vertex" OR "google cloud vertex" OR sagemaker OR pytorch OR tensorflow OR "hugging face") AND (cloud OR environment* or estate* OR platform* OR *spm* OR ((security OR posture) /3 management) OR orca OR vm* OR (virtual w/3 machine*) OR workload* OR asset* OR scan* OR pii OR estate OR bom* OR (bill /3 material*) OR inventor* OR quer* OR search* OR question* OR ask* OR discover*)}~~

With respect to the following edit to Orca's term proposed on the call today, in the interest of compromise, we can agree to move forward with this term.

~~(threatoptix OR jacques OR nicole OR sentinel* OR dominique OR walterspiel OR sentinel* OR equifax) AND (orca OR RFI OR learn OR "set up" OR acqui* OR purchas* OR offer OR steal OR take* OR know* OR customer*)~~

With respect to the following term, Wiz maintains its objections, as the revisions Orca has made do not address them.

((cloud w/5 (native OR security)) OR platform) w/15 (invest* OR profit* OR fund* OR venture OR market* OR demand OR compet* OR financ* OR revenue* OR sale* OR purchase* OR acqui* OR merg* OR cost* OR startup OR project* OR forecast* OR seed OR "series a" OR "series b" OR margin* OR milestone* OR price* OR pricing OR calculat* OR discount*))

In addition, as discussed on the call, Wiz reserves the right to object to the overall burden of Orca's requests in connection with future requests.

Regards,
Caty

From: Krissy.McKenna@lw.com <Krissy.McKenna@lw.com>
Sent: Wednesday, July 17, 2024 12:28 PM
To: Lacey, Catherine <clacey@wsgr.com>; Blake.Davis@lw.com; Lucas.Lonergan@lw.com; Ryan.Banks@lw.com; Prasad, Praatika <pprasad@wsgr.com>; WSGR - Orca Wiz <WSGR-Orca-Wiz@wsgr.com>; Cottrell@RLF.com; Farnan@RLF.com; haynes@rlf.com
Cc: orcasecuritywiz.lwteam@lw.com; RSmith@morrisnichols.com; JBlumenfeld@MNAT.com
Subject: RE: Orca v. Wiz | Priority ESI Requests

EXT - krissy.mckenna@lw.com

Thanks, Caty. We just received the slack/email breakdown for Wiz's terms, incorporated in the chart below. We will look out for Wiz's confirmation tonight on further narrowing Wiz's terms and your position on the ThreatOptix and cloud w/5 native terms.

Total Hits Deduped Across All Custodians:

Term #	Search Term	Total Documents Hit By Term	Total Documents Hit By Term Including Families	Sl
1	(snapshot* OR (snap w/3 shot*) OR (imag* w/5 (VM* OR machine*))) w/20 (scan* OR analy* OR visual* OR vulnerab* OR detect* OR priorit* OR *remediat* OR mitigat* OR pars* OR sensitiv* OR risk* OR *threat* OR config* OR encrypt* OR locat*)	11,024	31,551	
2a	("artificial intelligence" OR ai OR "large language model" OR llm OR *gpt* OR openai OR "open ai" OR "amazon bedrock" OR "AWS bedrock" OR "google vertex" OR "google cloud vertex" OR sagemaker OR pytorch OR tensorflow OR "hugging face") AND (cloud OR environment* OR estate* OR platform* OR *spm* OR ((security OR posture) w/3 management) OR orca OR vm* OR (virtual w/3 machine*) OR workload* OR asset* OR scan*)	62,347	99,481	
2b	("artificial intelligence" OR ai OR "large language model" OR llm OR *gpt* OR openai OR "open ai" OR "amazon bedrock" OR "AWS bedrock" OR "google vertex" OR "google cloud vertex" OR sagemaker OR pytorch OR tensorflow OR "hugging face") AND (pii OR estate OR bom* OR (bill w/3 material*) OR inventor* OR quer* OR search* OR question* OR ask* OR discover*)	26,656	59,808	

3	(risk* OR vulnerabil* OR threat*) w/20 (sever* OR scor* OR priorit* OR match*)	24,152	34,548	
4	(access* OR reach* OR attack*) AND (path* OR chain* OR vector* OR graph*)	46,543	94,714	
5	("beyond network*" OR wiz) AND (beat* OR win* OR compet* OR rac* OR playbook* OR kill* OR succe*)	7,037	8,423	
6	((agent* OR side) w/5 scan*) OR sidescan*	14,352	24,434	
7	("beyond network*" OR wiz) AND (patent* OR ip OR "intellectual property" OR invention* OR innovat* OR new)	5,947	7,249	
8	(microsoft w/5 "cloud security") OR (microsoft AND (yion OR costica OR assaf OR rappaport OR roy OR reznik OR ami OR luttwak))	2,250	18,823	
9	autoremediation OR automitigation OR ((auto* OR self OR event-driven) w/5 (remediat* OR mitigate*))	5,601	6,500	
10	("beyond network*" OR wiz) AND (risk* OR vulnerabil* OR threat*)	1,737	2,120	
11	("check point" OR checkpoint) AND (risk* OR vulnerabil* OR threat* OR secur*)	6,547	24,450	
12	("check point" OR checkpoint) AND (risk* OR vulnerabil* OR threat*)	663	1,180	

Best,
Krissy

From: Lacey, Catherine <clacey@wsgr.com>

Sent: Wednesday, July 17, 2024 3:01 PM

To: McKenna, Krissy (BN) <Krissy.McKenna@lw.com>; Davis, Blake (Bay Area) <Blake.Davis@lw.com>; Lonergan, Lucas (Bay Area) <Lucas.Lonergan@lw.com>; Banks, Ryan (OC) <Ryan.Banks@lw.com>; Prasad, Praatika <pprasad@wsgr.com>; WSGR - Orca Wiz <WSGR-Orca-Wiz@wsgr.com>; Cottrell@RLF.com; Farnan@RLF.com; haynes@rlf.com

Cc: #C-M ORCA SECURITY - WIZ - LW TEAM <orcasecuritywiz.lwteam@lw.com>; RSmith@morrisnichols.com; JBlumenfeld@MNAT.com

Subject: RE: Orca v. Wiz | Priority ESI Requests

Krissy,

The updated hit count deduped across custodians and terms for O365 is 110,171.

Thanks,
Caty

From: Lacey, Catherine <clacey@wsgr.com>

Sent: Wednesday, July 17, 2024 11:52 AM

To: Krissy.McKenna@lw.com; Blake.Davis@lw.com; Lucas.Lonergan@lw.com; Ryan.Banks@lw.com; Prasad, Praatika <pprasad@wsgr.com>; WSGR - Orca Wiz <WSGR-Orca-Wiz@wsgr.com>; Cottrell@RLF.com; Farnan@RLF.com; haynes@rlf.com

Cc: orcasecuritywiz.lwteam@lw.com; RSmith@morrisnichols.com; JBlumenfeld@MNAT.com

Subject: RE: Orca v. Wiz | Priority ESI Requests

Krissy,

With the latest revisions to Orca's terms, the Slack total hit count across custodians and terms is 38,568 documents (without families), and the O365 total hit count across custodians and terms should be <120,000 documents with families. We will provide a more exact number for O365 asap. There was an error in the way the terms were run for O365 that the vendor is attempting to address. The hit counts per-custodian are also below, but some of the totals are also impacted by the error:

Ami Luttwak

Clause	O365 DeDuplicated Docs	O365 DeDuplicated Docs w/Family	O365 Unique DeDuplicated Docs
orca* AND (avi OR shua OR gil OR geron OR roadmap OR battlecard OR playbook OR copy* OR copie* OR compet* OR confid* OR customer OR deal OR platform OR functional* OR feature OR vulnerabil* OR secret OR scan* OR VM OR takeout OR NDA OR portal OR access* OR MRI OR login OR ((implement* OR add* OR take OR use* OR pull*) w/5 (feature* OR tech* OR same OR similar OR solution OR method OR strategy OR approach OR stack)) OR problem* OR (better w/3 than) OR microsoft OR invent* OR patent* OR publication* OR application* OR provisional* OR "intellectual property" OR "IP")	1,089	1,478	685
"11,663,031" OR "11663031" OR "11,663,032" OR "11663032" OR "11,693,685" OR "11693685" OR "11,726,809" OR "11726809" OR "11,740,926" OR "11740926" OR "11,775,326" OR "11775326" OR "11,431,735" OR "11431735" OR ((*031 OR *032 OR *685 OR *809 OR *926 OR *326 OR *019 OR *287 OR *220 OR *313 OR *080 OR *527 OR *364 OR *150 OR *861 OR *201 OR *220 OR *181 OR *718 OR *735 OR *678 OR *967 OR *692 OR *556 OR *231 OR *976 OR *998 OR *798 OR *270 OR *345 OR *488 OR *750) w/10 (patent OR orca OR avi OR shua)) OR "11,772,554" OR "11772554" OR "11,929,896" OR "11929896" OR "11,936,693" OR "11936693" OR "12,001,549" OR "12001549" OR "12,003,529" OR "12003529" OR ((*554 OR *442 OR *082 OR *896 OR *190 OR *693 OR *845 OR *499 OR *549 OR *794 OR *529 OR *659) w/10 (patent OR orca OR avi OR shua))	823	3,405	508
sidescan* OR (side* w/5 scan) OR MRI OR (control w/3 plane) OR (data w/3 plane) OR out*of*band	1,258	6,113	917
((priorit* OR detect* OR *remediat* OR mitigat* OR analy* OR pars*) w/10 (threat* OR vulnerabil* OR secret* OR sensitive OR inactive)) AND (snapshot OR disk)	2,258	10,516	1,109

(M&B OR "ip analysts" OR michael OR mike OR ben-shimon OR prosecut* OR "mb-ip.com") AND (orca OR avi OR shua OR ((copy* OR copie* OR implement* OR add* OR take OR use* OR pull*) w/10 (feature* OR tech* OR same OR similar OR solution OR method OR strategy OR approach OR problem*)) OR (better w/3 than) OR NDA OR conflict OR sidescan* OR (side w/5 scan*) OR snapshot)	5,099	11,236	3,773
((cloud w/5 (native OR security)) OR platform) w/15 (invest* OR profit* OR fund* OR venture OR market* OR demand OR compet* OR financ* OR revenue* OR sale* OR purchase* OR acqui* OR merg* OR cost* OR startup OR project* OR forecast* OR seed OR "series a" OR "series b" OR margin* OR milestone* OR price* OR pricing OR calculat* OR discount*))	6,213	11,419	4,474
((attack w/5 path) OR "security dashboard" OR (cdr OR "cloud detection and response")) AND ((posture w/2 management) OR "Shift-Left" OR (shift w/3 left) OR (data w/3 model) OR ((securit* OR path OR apply*) w/6 policy))	306	1,042	38
("artificial intelligence" OR "AI-SPM" OR "security posture Management") OR ("LLM" OR LLM* OR "large language model" OR "large language models") OR (natural w/3 language) OR "BOM" OR (machine w/4 learn*) OR ((AI OR "artificial intelligence" OR LLM OR LLM* OR "large language models") w/5 (risk* OR database* OR model OR use OR detect))	3,858	6,231	2,090
TOTAL	16,818	31,144	13,594

Assaf Rappaport

Clause	O365 DeDuplicated Docs	O365 DeDuplicated Docs w/Family	O365 Unique DeDuplicated Docs
orca* AND (avi OR shua OR gil OR geron OR roadmap OR battlecard OR playbook OR copy* OR copie* OR compet* OR confid* OR customer OR deal OR platform OR functional* OR feature OR vulnerabil* OR secret OR scan* OR VM OR takeout OR NDA OR portal OR access* OR MRI OR login OR ((implement* OR add* OR take OR use* OR pull*) w/5 (feature* OR tech* OR same OR similar OR solution OR method OR strategy OR approach OR stack)) OR problem* OR (better w/3 than) OR microsoft OR invent* OR patent* OR publication* OR application* OR provisional* OR "intellectual property" OR "IP")	3,260	4,212	2,296

"11,663,031" OR "11663031" OR "11,663,032" OR "11663032" OR "11,693,685" OR "11693685" OR "11,726,809" OR "11726809" OR "11,740,926" OR "11740926" OR "11,775,326" OR "11775326" OR "11,431,735" OR "11431735" OR ((*031 OR *032 OR *685 OR *809 OR *926 OR *326 OR *019 OR *287 OR *220 OR *313 OR *080 OR *527 OR *364 OR *150 OR *861 OR *201 OR *220 OR *181 OR *718 OR *735 OR *678 OR *967 OR *692 OR *556 OR *231 OR *976 OR *998 OR *798 OR *270 OR *345 OR *488 OR *750) w/10 (patent OR orca OR avi OR shua)) OR "11,772,554" OR "11772554" OR "11,929,896" OR "11929896" OR "11,936,693" OR "11936693" OR "12,001,549" OR "12001549" OR "12,003,529" OR "12003529" OR ((*554 OR *442 OR *082 OR *896 OR *190 OR *693 OR *845 OR *499 OR *549 OR *794 OR *529 OR *659) w/10 (patent OR orca OR avi OR shua))	93	425	13
sidescan* OR (side* w/5 scan) OR MRI OR (control w/3 plane) OR (data w/3 plane) OR out*of*band	249	611	103
((priorit* OR detect* OR *remediat* OR mitigat* OR analy* OR pars*) w/10 (threat* OR vulnerabil* OR secret* OR sensitive OR inactive)) AND (snapshot OR disk)	472	1,586	240
(M&B OR "ip analysts" OR michael OR mike OR ben-shimon OR prosecut* OR "mb-ip.com") AND (orca OR avi OR shua OR ((copy* OR copie* OR implement* OR add* OR take OR use* OR pull*) w/10 (feature* OR tech* OR same OR similar OR solution OR method OR strategy OR approach OR problem*)) OR (better w/3 than) OR NDA OR conflict OR sidescan* OR (side w/5 scan*) OR snapshot)	3,345	5,440	2,291
((cloud w/5 (native OR security)) OR platform) w/15 (invest* OR profit* OR fund* OR venture OR market* OR demand OR compet* OR financ* OR revenue* OR sale* OR purchase* OR acqui* OR merg* OR cost* OR startup OR project* OR forecast* OR seed OR "series a" OR "series b" OR margin* OR milestone* OR price* OR pricing OR calculat* OR discount*))	8,565	12,152	7,479
(threatoptix OR jacques OR nicole OR sentinel* OR dominique OR walterspiel OR sentinel* OR equifax) AND (orca OR RFI OR learn OR "set up" OR acqui* OR purchas* OR offer OR steal OR take* OR know* OR customer*)	4,381	5,929	

Raaz Herzberg

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orca* AND (avi OR shua OR gil OR geron OR roadmap OR battlecard OR playbook OR copy* OR copie* OR compet* OR confid* OR customer OR deal OR platform OR functional* OR feature OR vulnerabil* OR secret OR scan* OR VM OR takeout OR NDA OR portal OR access* OR MRI OR login OR ((implement* OR add* OR take OR use* OR pull*) w/5 (feature* OR tech* OR same OR similar OR solution OR method OR strategy OR approach OR stack)) OR problem* OR (better w/3 than) OR microsoft OR invent* OR patent* OR publication* OR application* OR provisional* OR "intellectual property" OR "IP")	3,216	4,025	2,403
"11,663,031" OR "11663031" OR "11,663,032" OR "11663032" OR "11,693,685" OR "11693685" OR "11,726,809" OR "11726809" OR "11,740,926" OR "11740926" OR "11,775,326" OR "11775326" OR "11,431,735" OR "11431735" OR ((*031 OR *032 OR *685 OR *809 OR *926 OR *326 OR *019 OR *287 OR *220 OR *313 OR *080 OR *527 OR *364 OR *150 OR *861 OR *201 OR *220 OR *181 OR *718 OR *735 OR *678 OR *967 OR *692 OR *556 OR *231 OR *976 OR *998 OR *798 OR *270 OR *345 OR *488 OR *750) w/10 (patent OR orca OR avi OR shua)) OR "11,772,554" OR "11772554" OR "11,929,896" OR "11929896" OR "11,936,693" OR "11936693" OR "12,001,549" OR "12001549" OR "12,003,529" OR "12003529" OR ((*554 OR *442 OR *082 OR *896 OR *190 OR *693 OR *845 OR *499 OR *549 OR *794 OR *529 OR *659) w/10 (patent OR orca OR avi OR shua))	105	274	28
sidescan* OR (side* w/5 scan) OR MRI OR (control w/3 plane) OR (data w/3 plane) OR out*of*band	1,058	1,864	693
((priorit* OR detect* OR *remediat* OR mitigat* OR analy* OR pars*) w/10 (threat* OR vulnerabil* OR secret* OR sensitive OR inactive)) AND (snapshot OR disk)	2,592	4,049	2,103
((cloud w/5 (native OR security)) OR platform) w/15 (invest* OR profit* OR fund* OR venture OR market* OR demand OR compet* OR financ* OR revenue* OR sale* OR purchase* OR acqui* OR merg* OR cost* OR startup OR project* OR forecast* OR seed OR "series a" OR "series b" OR margin* OR milestone* OR price* OR pricing OR calculat* OR discount*)	7,571	11,325	6,216
roadmap OR battlecard OR playbook	9,463	11,956	8,079
(threatoptix OR jacques OR nicole OR sentinel* OR dominique OR walterspiel OR sentinel* OR equifax) AND (orca OR RFI OR learn OR "set up" OR acqui* OR purchas* OR offer OR steal OR take* OR know* OR customer*)	4,477	5,841	

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orca* AND (avi OR shua OR gil OR geron OR roadmap OR battlecard OR playbook OR copy* OR copie* OR compet* OR confid* OR customer OR deal OR platform OR functional* OR feature OR vulnerabil* OR secret OR scan* OR VM OR takeout OR NDA OR portal OR access* OR MRI OR login OR ((implement* OR add* OR take OR use* OR pull*) w/5 (feature* OR tech* OR same OR similar OR solution OR method OR strategy OR approach OR stack)) OR problem* OR (better w/3 than) OR microsoft OR invent* OR patent* OR publication* OR application* OR provisional* OR "intellectual property" OR "IP")	4,366	5,473	2,791
"11,663,031" OR "11663031" OR "11,663,032" OR "11663032" OR "11,693,685" OR "11693685" OR "11,726,809" OR "11726809" OR "11,740,926" OR "11740926" OR "11,775,326" OR "11775326" OR "11,431,735" OR "11431735" OR ((*031 OR *032 OR *685 OR *809 OR *926 OR *326 OR *019 OR *287 OR *220 OR *313 OR *080 OR *527 OR *364 OR *150 OR *861 OR *201 OR *220 OR *181 OR *718 OR *735 OR *678 OR *967 OR *692 OR *556 OR *231 OR *976 OR *998 OR *798 OR *270 OR *345 OR *488 OR *750) w/10 (patent OR orca OR avi OR shua)) OR "11,772,554" OR "11772554" OR "11,929,896" OR "11929896" OR "11,936,693" OR "11936693" OR "12,001,549" OR "12001549" OR "12,003,529" OR "12003529" OR ((*554 OR *442 OR *082 OR *896 OR *190 OR *693 OR *845 OR *499 OR *549 OR *794 OR *529 OR *659) w/10 (patent OR orca OR avi OR shua))	100	262	23
sidescan* OR (side* w/5 scan) OR MRI OR (control w/3 plane) OR (data w/3 plane) OR out*of*band	790	2,593	441
((priorit* OR detect* OR *remediat* OR mitigat* OR analy* OR pars*) w/10 (threat* OR vulnerabil* OR secret* OR sensitive OR inactive)) AND (snapshot OR disk)	1,796	6,112	613
(M&B OR "ip analysts" OR michael OR mike OR ben-shimon OR prosecut* OR "mb-ip.com") AND (orca OR avi OR shua OR ((copy* OR copie* OR implement* OR add* OR take OR use* OR pull*) w/10 (feature* OR tech* OR same OR similar OR solution OR method OR strategy OR approach OR problem*)) OR (better w/3 than) OR NDA OR conflict OR sidescan* OR (side w/5 scan*) OR snapshot)	5,631	9,671	3,914
(threatoptix OR jacques OR nicole OR sentinel* OR dominique OR walterspiel OR sentinel* OR equifax) AND (orca OR RFI OR learn OR "set up" OR acqui* OR purchas* OR offer OR steal OR take* OR know* OR customer*)	3,824	5,645	2,183

((cloud w/5 (native OR security)) OR platform) w/15 (invest* OR profit* OR fund* OR venture OR market* OR demand OR compet* OR financ* OR revenue* OR sale* OR purchase* OR acqui* OR merg* OR cost* OR startup OR project* OR forecast* OR seed OR "series a" OR "series b" OR margin* OR milestone* OR price* OR pricing OR calculat* OR discount*))	11,469	18,524	8,416
((attack w/5 path) OR "security dashboard" OR (cdr OR "cloud detection and response")) AND ((posture w/2 management) OR "Shift-Left" OR (shift w/3 left) OR (data w/3 model) OR (securit* OR path OR apply*) w/6 policy))	765	2,257	106
("artificial intelligence" OR "AI-SPM" OR "security posture Management") OR ("LLM" OR LLM* OR "large language model" OR "large language models") OR (natural w/3 language) OR "BOM" OR (machine w/4 learn*) OR ((AI OR "artificial intelligence" OR LLM OR LLM* OR "large language models") w/5 (risk* OR database* OR model OR use OR detect))	4,756	8,768	2,540
TOTAL	26,327	38,885	21,027

Thanks,
Caty

From: Krissy.McKenna@lw.com <Krissy.McKenna@lw.com>

Sent: Wednesday, July 17, 2024 9:35 AM

To: Lacey, Catherine <clacey@wsgr.com>; Blake.Davis@lw.com; Lucas.Lonergan@lw.com; Ryan.Banks@lw.com; Prasad, Praatika <pprasad@wsgr.com>; WSGR - Orca Wiz <WSGR-Orca-Wiz@wsgr.com>; Cottrell@RLF.com; Farnan@RLF.com; haynes@rlf.com

Cc: orcasecuritywiz.lwteam@lw.com; RSmith@morrisnichols.com; JBlumenfeld@MNAT.com

Subject: RE: Orca v. Wiz | Priority ESI Requests

EXT - krissy.mckenna@lw.com

Hi Caty, yes, we can do 3pm ET, but have a hard stop a few minutes before 4pm ET. I'll update the invite now.

From: Lacey, Catherine <clacey@wsgr.com>

Sent: Wednesday, July 17, 2024 12:29 PM

To: McKenna, Krissy (BN) <Krissy.McKenna@lw.com>; Davis, Blake (Bay Area) <Blake.Davis@lw.com>; Lonergan, Lucas (Bay Area) <Lucas.Lonergan@lw.com>; Banks, Ryan (OC) <Ryan.Banks@lw.com>; Prasad, Praatika <pprasad@wsgr.com>; WSGR - Orca Wiz <WSGR-Orca-Wiz@wsgr.com>; Cottrell@RLF.com; Farnan@RLF.com; haynes@rlf.com

Cc: #C-M ORCA SECURITY - WIZ - LW TEAM <orcasecuritywiz.lwteam@lw.com>; RSmith@morrisnichols.com; JBlumenfeld@MNAT.com

Subject: RE: Orca v. Wiz | Priority ESI Requests

Hi Krissy,

Thank you. Are you all still available at 3:00 PM ET / noon PT and could we push the meeting to that time? We expected to have hit counts in time for this morning, but our vendor is still working through them.

Regards,
Caty

From: Krissy.McKenna@lw.com <Krissy.McKenna@lw.com>

Sent: Wednesday, July 17, 2024 8:28 AM

To: Lacey, Catherine <clacey@wsgr.com>; Blake.Davis@lw.com; Lucas.Lonergan@lw.com; Ryan.Banks@lw.com; Prasad, Praatika <pprasad@wsgr.com>; WSGR - Orca Wiz <WSGR-Orca-Wiz@wsgr.com>; Cottrell@RLF.com; Farnan@RLF.com; haynes@rlf.com

Cc: orcasecuritywiz.lwteam@lw.com; RSmith@morrisnichols.com; JBlumenfeld@MNAT.com

Subject: RE: Orca v. Wiz | Priority ESI Requests

EXT - krissy.mckenna@lw.com

Caty,

Below are updated hit counts for Wiz's revised search terms. Note that Wiz's revised AI term exceeded the character count for our document vendor to run as one term, so we had to break the term into two subsets, shown below as parts (a) and (b). We can discuss further on today's meet and confer. In addition, we are still waiting on the breakdown of slack vs. email documents from our vendor. We will follow up once we have those numbers, but wanted to provide you with the total updated hit counts ahead of meeting at 1pm ET. Please let us know when you will have updated counts for Orca's revised terms provided on Monday.

Avi Shua

Term #	Search Term	Total Hit Count	Total Hits Including Family	Unique Hits
1a	("artificial intelligence" OR ai OR "large language model" OR llm OR *gpt* OR openai OR "open ai" OR "amazon bedrock" OR "AWS bedrock" OR "google vertex" OR "google cloud vertex" OR sagemaker OR pytorch OR tensorflow OR "hugging face") AND (cloud OR environment* OR estate* OR platform* OR *spm* OR ((security OR posture) w/3 management) OR orca OR vm* OR (virtual w/3 machine*) OR workload* OR asset* OR scan*)	19,666	23,965	8,311
1b	("artificial intelligence" OR ai OR "large language model" OR llm OR *gpt* OR openai OR "open ai" OR "amazon bedrock" OR "AWS bedrock" OR "google vertex" OR "google cloud vertex" OR sagemaker OR pytorch OR tensorflow OR "hugging face") AND (pii OR estate OR bom* OR (bill w/3 material*) OR inventor* OR quer* OR search* OR question* OR ask* OR discover*)	9,518	12,277	0
2	(risk* OR vulnerabil* OR threat*) w/20 (sever* OR scor* OR priorit* OR match*)	11,166	17,671	2,466

Arie Teter

Term #	Search Term	Hit Count	Total Hits Incl Family
1a	("artificial intelligence" OR ai OR "large language model" OR llm OR *gpt* OR openai OR "open ai" OR "amazon bedrock" OR "AWS bedrock" OR "google vertex" OR "google cloud vertex" OR sagemaker OR pytorch OR tensorflow OR "hugging face") AND (cloud OR environment* OR estate* OR platform* OR *spm* OR ((security OR posture) w/3 management) OR orca OR vm* OR (virtual w/3 machine*) OR workload* OR asset* OR scan*)	12,595	41,828
1b	("artificial intelligence" OR ai OR "large language model" OR llm OR *gpt* OR openai OR "open ai" OR "amazon bedrock" OR "AWS bedrock" OR "google vertex" OR "google cloud vertex" OR sagemaker OR pytorch OR tensorflow OR "hugging face") AND (pii OR estate OR bom* OR (bill w/3 material*) OR inventor* OR quer* OR search* OR question* OR ask* OR discover*)	4,795	33,505
2	(risk* OR vulnerabil* OR threat*) w/20 (sever* OR scor* OR priorit* OR match*)	8,416	9,053

Yoav Alon

Term #	Search Term	Hit Count	Total Hits Incl Family
1a	("artificial intelligence" OR ai OR "large language model" OR llm OR *gpt* OR openai OR "open ai" OR "amazon bedrock" OR "AWS bedrock" OR "google vertex" OR "google cloud vertex" OR sagemaker OR pytorch OR tensorflow OR "hugging face") AND (cloud OR environment* OR estate* OR platform* OR *spm* OR ((security OR posture) w/3 management) OR orca OR vm* OR (virtual w/3 machine*) OR workload* OR asset* OR scan*)	13,866	30,237
1b	("artificial intelligence" OR ai OR "large language model" OR llm OR *gpt* OR openai OR "open ai" OR "amazon bedrock" OR "AWS bedrock" OR "google vertex" OR "google cloud vertex" OR sagemaker OR pytorch OR tensorflow OR "hugging face") AND (pii OR estate OR bom* OR (bill w/3 material*) OR inventor* OR quer* OR search* OR question* OR ask* OR discover*)	5,172	20,326
2	(risk* OR vulnerabil* OR threat*) w/20 (sever* OR scor* OR priorit* OR match*)	6,602	8,614

Meghan Marks

Term #	Search Term	Hit Count	Total Hits Incl Family
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1a	("artificial intelligence" OR ai OR "large language model" OR llm OR *gpt* OR openai OR "open ai" OR "amazon bedrock" OR "AWS bedrock" OR "google vertex" OR "google cloud vertex" OR sagemaker OR pytorch OR tensorflow OR "hugging face") AND (cloud OR environment* OR estate* OR platform* OR *spm* OR ((security OR posture) w/3 management) OR orca OR vm* OR (virtual w/3 machine*) OR workload* OR asset* OR scan*)	21,234	23,142
1b	("artificial intelligence" OR ai OR "large language model" OR llm OR *gpt* OR openai OR "open ai" OR "amazon bedrock" OR "AWS bedrock" OR "google vertex" OR "google cloud vertex" OR sagemaker OR pytorch OR tensorflow OR "hugging face") AND (pii OR estate OR bom* OR (bill w/3 material*) OR inventor* OR quer* OR search* OR question* OR ask* OR discover*)	9,955	10,983
2	(risk* OR vulnerabil* OR threat*) w/20 (sever* OR scor* OR priorit* OR match*)	2,327	4,062

Total Hits Deduped Across All Custodians:

Term #	Search Term	Total Documents Hit By Term
1	(snapshot* OR (snap w/3 shot*) OR (imag* w/5 (VM* OR machine*))) w/20 (scan* OR analy* OR visual* OR vulnerab* OR detect* OR priorit* OR *remediat* OR mitigat* OR pars* OR sensitiv* OR risk* OR *threat* OR config* OR encrypt* OR locat*)	11,024
2a	("artificial intelligence" OR ai OR "large language model" OR llm OR *gpt* OR openai OR "open ai" OR "amazon bedrock" OR "AWS bedrock" OR "google vertex" OR "google cloud vertex" OR sagemaker OR pytorch OR tensorflow OR "hugging face") AND (cloud OR environment* OR estate* OR platform* OR *spm* OR ((security OR posture) w/3 management) OR orca OR vm* OR (virtual w/3 machine*) OR workload* OR asset* OR scan*)	62,347
2b	("artificial intelligence" OR ai OR "large language model" OR llm OR *gpt* OR openai OR "open ai" OR "amazon bedrock" OR "AWS bedrock" OR "google vertex" OR "google cloud vertex" OR sagemaker OR pytorch OR tensorflow OR "hugging face") AND (pii OR estate OR bom* OR (bill w/3 material*) OR inventor* OR quer* OR search* OR question* OR ask* OR discover*)	26,656
3	(risk* OR vulnerabil* OR threat*) w/20 (sever* OR scor* OR priorit* OR match*)	24,152
4	(access* OR reach* OR attack*) AND (path* OR chain* OR vector* OR graph*)	46,543
5	("beyond network*" OR wiz) AND (beat* OR win* OR compet* OR rac* OR playbook* OR kill* OR succe*)	7,037
6	((agent* OR side) w/5 scan*) OR sidescan*	14,352
7	("beyond network*" OR wiz) AND (patent* OR ip OR "intellectual property" OR invention* OR innovat* OR new)	5,947
8	(microsoft w/5 "cloud security") OR (microsoft AND (yion OR costica OR assaf OR rappaport OR roy OR reznik OR ami OR luttwak))	2,250

9	autoremediation OR automitigation OR ((auto* OR self OR event-driven) w/5 (remediat* OR mitigate*))	5,601
10	("beyond network*" OR wiz) AND (risk* OR vulnerabil* OR threat*)	1,737
11	("check point" OR checkpoint) AND (risk* OR vulnerabil* OR threat* OR secur*)	6,547
12	("check point" OR checkpoint) AND (risk* OR vulnerabil* OR threat*)	663

Total Documents De-duped Across All Terms and All Custodians

Total Documents	Total Documents Including Email Families
147,752	204,525

Best,
Krissy

From: Lacey, Catherine <clacey@wsgr.com>

Sent: Tuesday, July 16, 2024 5:50 PM

To: McKenna, Krissy (BN) <Krissy.McKenna@lw.com>; Davis, Blake (Bay Area) <Blake.Davis@lw.com>; Lonergan, Lucas (Bay Area) <Lucas.Lonergan@lw.com>; Banks, Ryan (OC) <Ryan.Banks@lw.com>; Prasad, Praatika <pprasad@wsgr.com>; WSGR - Orca Wiz <WSGR-Orca-Wiz@wsgr.com>; Cottrell@RLF.com; Farnan@RLF.com; haynes@rlf.com

Cc: #C-M ORCA SECURITY - WIZ - LW TEAM <orcasecuritywiz.lwteam@lw.com>; RSmith@morrisnichols.com; JBlumenfeld@MNAT.com

Subject: RE: Orca v. Wiz | Priority ESI Requests

Krissy,

We are available at 1 PM ET / 10 AM PT tomorrow (Wednesday) to continue discussing. Please run the below revised versions of Wiz's search terms:

Term #	Search Term
2	("artificial intelligence" OR ai OR "large language model" OR llm OR *gpt* OR openai OR "open ai" OR "amazon bedrock" OR "AWS bedrock" OR "google vertex" OR "google cloud vertex" OR sagemaker OR pytorch OR tensorflow OR "hugging face") AND (cloud OR environment* OR estate* OR platform* OR *spm* OR ((security OR posture) /3 management) OR orca OR vm* OR (virtual w/3 machine*) OR workload* OR asset* OR scan* OR pii OR estate OR bom* OR (bill /3 material*) OR inventor* OR quer* OR search* OR question* OR ask* OR discover*)
3	(risk* OR vulnerabil* OR threat*) w/20 (sever* OR scor* OR priorit* OR match* OR OR-alert*)

Regards,
Caty